

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,** )

**Plaintiff,** )

**v.** )

**Case No. 10CR-116 BDB**

**HAROLD R. WELLS, NICK** )

**DEBRUIN, and ERNEST BRUCE** )

**BONHAM** )

**Defendants.** )

**UNITED STATES' NOTICE REGARDING DISCLOSURE OF TULSA POLICE  
DEPARTMENT PERSONNEL AND INTERNAL AFFAIRS FILES**

The United States of America, by and through counsel, Jane W. Duke, Patrick Harris, and Patricia S. Harris, Special Assistant United States Attorneys, files this Notice regarding production of Tulsa Police Department personnel and internal affairs files. This notice relates to defendant Nick DeBruin's motion for disclosure of law enforcement personnel files (Docket Number 94), but is not directly responsive thereto.

At a recent hearing in this matter, the United States agreed to obtain the personnel and internal affairs files from the Tulsa Police Department for all of its witnesses who are currently, or who were formerly, employed by TPD. The United States agreed to obtain these files and submit same to the Court for *in camera* review to determine the existence of potential *Giglio* information. However, since this recent hearing, an alternative arrangement has been agreed to by the United States, the City of Tulsa, and all defense counsel in this

case. Specifically, in lieu of actual production of the files, defense counsel have agreed to accept the City of Tulsa's review and summary statement as to any potential *Giglio* material for its current or former personnel who may be called as Government witnesses in this case. As reflected in the e-mail correspondence attached to this Notice, this agreement satisfies the United States' obligation to provide defense counsel with *Giglio* information on its witnesses that is possessed by, or known to, the Tulsa Police Department. (See Exhibit 1(a)-1(c)).

As further reflected in the attached exhibits, the information has been provided to the United States by hand-delivery from the City of Tulsa. Counsel for the United States is sending out a duplicate CD of this information to all defense counsel today by Federal Express.

WHEREFORE, the United States submits this Notice to the Court.

Respectfully submitted,

/S/ Jane W. Duke  
JANE W. DUKE (Ark. Bar #96190)  
PATRICK C. HARRIS (Ark. Bar #85069)  
PATRICIA S. HARRIS (Ark. Bar #89208)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of May, 2011, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

William D. Lunn  
Warren Gotcher  
Shannon M. McMurray

/s/ Jane W. Duke  
Jane W. Duke  
Special Assistant United States Attorney